

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

NORTHEASTERN PENNSYLVANIA  
FREETHOUGHT SOCIETY,

Plaintiff,

v.

COUNTY OF LACKAWANNA  
TRANSIT SYSTEM,

Defendant.

Civil Action No. 3:15-CV-00833-MEM

(Judge Mannion)

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEY’S FEES AND  
COSTS PURSUANT TO 42 U.S.C. § 1988**

Plaintiff Northeastern Pennsylvania Freethought Society, through its undersigned counsel, moves the Court for an order granting it its reasonable attorney’s fees and costs as the prevailing party in this complex civil rights litigation. The reasons in support of Plaintiff’s motion are set forth in the accompanying brief, which is incorporated herein by reference.

WHEREFORE, Plaintiff Northeastern Pennsylvania Freethought Society respectfully requests that the Court enter an order awarding it its reasonable attorney's fees and costs pursuant to 42 U.S.C. § 1988 as the prevailing party in this litigation.

Respectfully Submitted,

/s/ Stephen J. Shapiro

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**CERTIFICATE OF NON-CONCURRENCE**

I, Stephen J. Shapiro, certify that Plaintiff sought concurrence from defendant County of Lackawanna Transit System (“COLTS”) in the relief requested in this motion for award of attorney’s fees and that COLTS responded that it does not concur in the relief requested.

/s/Stephen J. Shapiro

Dated: March 20, 2020